



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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November 7, 1994

R. Jay Marshall  
Genwal Coal Company Inc.  
P. O. Box 1201  
Huntington, Utah 84528

Re: Deficient SAE Plans, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032-94E, Folder #2, Emery County, Utah

Dear Mr. Marshall:

The Division has completed a review of your submittal made on October 21, 1994, intended to correct the Crandall Canyon plan with regard to ASCA's and SAE's. The information provided describing the ASCA's is appropriate and is hereby accepted. However, the information describing the SAE's is not adequate. Additional clarification and information is needed before your plan amendment can be approved. The following discussion describes the problems with your submittal.

SAE's 3,5,6, and 7 are identified and described. SAE 3 appears to meet the required criteria; the operator has provided a SEDIMOT II analysis which demonstrates that runoff from this area would meet effluent limits. There is a discussion regarding "dam failure" attached to the description. No dam has been mentioned in the description of SAE-3. Reference to this "dam" needs to be clarified or eliminated. SAE's 5, 6, and 7 consist of topsoil storage areas. The description of these areas indicates that the stockpiles themselves are protected from erosion by a combination of dikes, berms, and a vegetative cover. The disturbed areas around the topsoil piles were formerly protected by straw bale dikes. The operator assumes that these are no longer necessary for protection, but provides no demonstration thereof. It may be true that vegetation establishment around the topsoil piles negates the need for erosion control measures, but the operator offers no proof that this is so.

Please address the above issues and submit a response by November 23, 1994. If you have any questions, please call.

Sincerely,

Daron R. Haddock  
Permit Supervisor

cc: P. Grubaugh-Littig  
J. Helfrich  
SAELET.GEN



November 4, 1994

~~Mr.~~ R. Jay Marshall  
Genwal Coal Company Inc.  
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Huntington, Utah 84528

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saelet.gen